

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

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PUBLIC SERVICE
COMMISSION

In the Matter of:

THE APPLICATION OF ALLTEL)
COMMUNICATIONS, INC. FOR A CERTIFICATE OF)
PUBLIC CONVENIENCE AND NECESSITY TO)
CONSTRUCT A CELL SITE AT 14305 OLD U.S.)
ROUTE 23 SITUATED ON THE DIVIDING RIDGE)
BETWEEN NEW U.S. 23 AND OLD U.S. 23 NORTH)
OF SAVAGE BRANCH IN BOYD COUNTY,)
KENTUCKY)
(NEAL CELLULAR TOWER SITE))

CASE NO.
2007-00305

THE APPLICATION OF CELLCO PARTNERSHIP)
D/B/A VERIZON WIRELESS FOR ISSUANCE OF A)
CERTIFICATE OF PUBLIC CONVENIENCE AND)
NECESSITY TO CONSTRUCT A WIRELESS)
COMMUNICATIONS FACILITY AT 8215 SAVAGE)
BRANCH, CATLETTSBURG, KENTUCKY IN THE)
WIRELESS COMMUNICATIONS LICENSE AREA IN)
THE COMMONWEALTH OF KENTUCKY IN THE)
COUNTY OF BOYD)

CASE NO.
2007-00309

SITE NAME: SAVAGE BRANCH

**RESPONSE OF CELLCO PARTNERSHIP, D/B/A VERIZON WIRELESS
TO COMMISSION STAFF DATA REQUEST**

Comes Cellco Partnership, d/b/a Verizon Wireless (“Verizon Wireless”), by counsel,
and for its Response to the Commission Staff Data Request in the above-captioned matter,
states as follows:

1. On July 18, 2007, Verizon Wireless filed an application seeking a Certificate of Public Convenience and Necessity (“CPCN”) to construct and operate a wireless telecommunications facility at 8215 Savage Branch, Catlettsburg, Kentucky (the “Savage

Branch site”).

2. The Savage Branch site has been designed and located with consideration to Verizon Wireless’ radio frequency needs to provide service in the area as part of its wireless communications network.

3. Two days after Verizon Wireless filed its Savage Branch application, Alltel Communications, Inc. (“Alltel”) filed an application for its proposed Neal Cellular Tower site (“the “Neal site”) on July 20, 2007.

4. The effectiveness and quality of the wireless communications services that Verizon Wireless intends to provide from the site are, in large measure, dictated by topographical features of the area to be served and in which the facility is located. Therefore, the Savage Branch site location (38-20-45.25 North latitude, 82-36-42.77 West longitude) was selected and the 300-foot antenna height was carefully determined by Verizon Wireless’ radio frequency engineers to meet service objectives.

5. The Neal site proposes a significantly shorter (189-foot) tower, which would necessitate an antenna placement significantly below the 300 feet needed by Verizon Wireless for optimum service if Verizon Wireless were to co-locate on the facility, especially given the separation needed between antenna arrays for proper function.

6. Verizon Wireless’ radio frequency engineer for the project has analyzed the Neal site in terms of radio frequency propagation, projected signal strength and coverage area, and Verizon Wireless has concluded that the Neal site does not provide sufficient height to meet Verizon Wireless’ service needs. This conclusion is stated in the letter attached as **Exhibit A** to this Response.

7. Verizon Wireless will permit co-location on its facility by other carriers, including Alltel, under reasonable terms and conditions consistent with industry practice.

8. The Savage Branch site will accommodate co-location of antennas at approximately 280 feet and lower, which range includes and exceeds all above ground level ("AGL") heights and above mean sea level ("AMSL") elevations available on the proposed Neal site tower.

9. The Savage Branch site will accommodate co-location of antennas at the elevation Alltel appears to propose for its needs at the Neal site (i.e., 180 feet AGL). In contrast, the Neal site cannot accommodate the antenna elevation for Verizon Wireless that the Savage Branch tower has been designed to provide.

10. The 315-foot total structure height for Savage Branch site, which height will meet Verizon Wireless' service objectives and permit collocation of multiple additional carriers, has already been approved by the Federal Aviation Administration ("FAA") and Kentucky Airport Zoning Commission ("KAZC"). A copy of the FAA approval was attached to the CPCN Application and a copy of the KAZC approval is attached as **Exhibit B**.

11. The Savage Branch site meets the needs of Verizon Wireless and provides significantly greater opportunity for co-location than the Neal site. Although the specific needs for Alltel are not known to Verizon Wireless, the heights available for co-location by Alltel on the Savage Branch tower include all heights proposed by Alltel on the Neal tower and more.

12. There are no existing structures in the area that provide a co-location opportunity for Verizon Wireless to meet its service needs, and the Verizon Wireless

Savage Branch site presents the best opportunity to co-locate both Alltel and Verizon Wireless on a single facility in the area.

WHEREFORE, for the reasons stated above and in its filed application, Applicant respectfully requests that the Commission grant a Certificate of Public Convenience and Necessity to Verizon Wireless to construct and operate the Savage Branch site at the location set forth herein.

Respectfully submitted,



David A. Pike
Pike Legal Group, PLLC
1578 Highway 44 East, Suite 6
P. O. Box 369
Shepherdsville, KY 40165-0369
Telephone: (502) 955-4400
Telefax: (502) 543-4410
Attorney for Cellco Partnership,
d/b/a Verizon Wireless

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Response was mailed, postage prepaid, to Mark R. Overstreet, Stites & Harbison, P. O. Box 634, Frankfort, KY 40602-0634 on this the 20th day of August, 2007.



David A. Pike
Attorney for Cellco Partnership
d/b/a Verizon Wireless

LIST OF EXHIBITS

- A - Radio Frequency Engineer's Letter
- B - KAZC Approval Letter

EXHIBIT A

RADIO FREQUENCY ENGINEER'S LETTER

Network Services



Verizon Wireless
7575 Commerce Court
Lewis Center, OH 43035-9702

Phone 740 657-3106

August 16, 2007

John R. Parker
Verizon Wireless
7575 Commerce Court
Lewis Center, Ohio 43035

RE: Verizon Wireless "Savage Branch" Site (PSC Case No. 2007-00309)

Dear Commission Staff:

I am providing this letter to state the conclusions of Verizon Wireless' analysis of the wireless communications facility proposed by ALLTEL Communications, Inc. ("ALLTEL") that is the subject of PSC case number 2007-00305 (the "Neal site"), including the feasibility of the Neal site to accommodate the service needs of Verizon Wireless relative to the site proposed by Verizon Wireless (the "Savage Branch site; PSC case number 2007-00309).

The most significant difference between the proposals is the proposed tower height. The 305-foot tower proposed for the Savage Branch site has been designed to accommodate the antenna elevation needed to provide quality wireless communications coverage and service for the area. This antenna elevation has been determined by Verizon Wireless' radio frequency engineers as the optimum elevation to provide service given the location, surrounding topography and projected usage patterns.

In contrast, the shorter 189-foot tall tower proposed by Alltel will not accommodate the antenna elevation needed by Verizon Wireless, even after taking relative ground elevations into account. Consequently, a co-location of Verizon Wireless' antennas on the Alltel tower would not address satisfactorily Verizon Wireless' service need for the area and would result in significantly less coverage, greater coverage gaps and less reliable service to area users.

As a general matter, it is Verizon Wireless' policy to accommodate co-location of other carriers. Although the specific needs for ALLTEL are not known to Verizon Wireless, the Verizon Wireless Savage Branch tower would be available as a colocation opportunity for ALLTEL under reasonable terms and conditions consistent with industry practice, and would provide all antenna elevation levels available on the proposed Neal tower and more.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "J. R. Parker", written in a cursive style.

John R. Parker
Verizon Wireless Performance Engineering

EXHIBIT B
KAZC APPROVAL LETTER



Kentucky Airport Zoning Commission
200 Mero Street
Frankfort, KY 40622

(502) 564-4480
fax: (502) 564-7953
No.: AS-010-DWU-06-225

February 14, 2007

APPROVAL OF APPLICATION

APPLICANT:

Cellco Partnership
Jim O'Dowd
One Verizon Center
Basking Ridge, NJ 07920

SUBJECT: AS-010-DWU-06-225

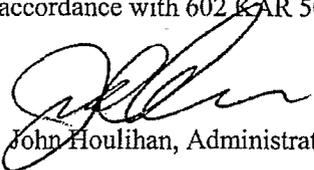
STRUCTURE: Antenna Tower
LOCATION: Catlettsburg, KY
COORDINATES: 38-20-45.25 N / 82-36-42.77 W
HEIGHT: 315'AGL/1108'AMSL

The Kentucky Airport Zoning Commission has approved your application for a permit to construct 315'AGL/1108'AMSL Antenna Tower near Catlettsburg, KY 38-20-45.25 N / 82-36-42.77 W.

This permit is valid for a period of 18 Month(s) from its date of issuance. If construction is not completed within said 18-Month period, this permit shall lapse and be void, and no work shall be performed without the issuance of a new permit.

A copy of the approved application is enclosed for your files.

Dual obstruction lighting is required in accordance with 602 KAR 50:100.


John Houlihan, Administrator



Kentucky Airport Zoning Commission
 200 Mero Street
 Frankfort, KY 40622

(502) 564-4480
 fax: (502) 564-7953
 No.: AS-010-DWU-06-225

CONSTRUCTION/ALTERATION STATUS REPORT

February 14, 2007

AERONAUTICAL STUDY NUMBER: AS-010-DWU-06-225

Cellco Partnership
 Jim O'Dowd
 One Verizon Center
 Basking Ridge, NJ 07920

This concerns the permit which was issued to you by the Kentucky Airport Zoning Commission on February 14, 2007. This permit is valid for a period of 18 Month(s) from its date of issuance. If construction is not completed within the said 18-Month period, this permit shall lapse and be void, and no work shall be performed without the issuance of a new permit. When appropriate, please indicate the status of the project in the place below and return this letter to John Houlihan, Administrator, Kentucky Airport Zoning Commission, 200 Mero Street, Frankfort, KY 40622.

(502) 564-4480.

STRUCTURE: Antenna Tower
 LOCATION: Catlettsburg, KY
 COORDINATES: 38-20-45.25 N / 82-36-42.77 W
 HEIGHT: 315'AGL/1108'AMSL

CONSTRUCTION/ALTERATION STATUS

1. The project () is abandoned. () is not abandoned.

2. Construction status is as follows:

Structure reached its greatest height of _____ ft. AGL
 _____ ft. AMSL on _____ (date).

Date construction was completed. _____

Type of obstruction marking/painting. _____

Type of obstruction lighting. _____

As built coordinates. _____

Miscellaneous Information: _____

DATE _____

SIGNATURE/TITLE _____

Kentucky Transportation Cabinet, Kentucky Airport Zoning Commission, 200 Mero Street, Frankfort KY 40622

Kentucky Aeronautical Study Number

APPLICATION FOR PERMIT TO CONSTRUCT OR ALTER A STRUCTURE

AS-DIV-DNU-06-205

1. APPLICANT - Name, Address, Telephone, Fax, etc.

Celco Partnership
 One Verizon Center
 Basking Ridge, NJ 07920
 908-559-7274

9. Latitude: 38 ° 20 ' 45.25

10. Longitude: 082 ° 36 ' 42.77 "

11. Datum: NAD 83 NAD 27 Other

12. Nearest Kentucky City Catlettsburg County: Boyd

2. Representative of Applicant - Name, Address, Telephone, Fax

Jim O'Dowd
 Verizon Wireless
 One Verizon Center
 Basking Ridge, NJ 07920
 908-559-7274

13. Nearest Kentucky public use or Military airport:
 Tri-State/Milton J.

14. Distance from #13 to Structure 2.8289 NM

15. Direction from #13 to Structure: 63.88 degrees

3. Application for: New Construction Alteration Existing

4. Duration: Permanent Temporary (Months _____ Days _____)

5. Work Schedule: Start _____ End _____

6. Type: Antenna Tower Crane Building Power Line
 Landfill Water Tank Other _____

7. Marking/Painting and/or Lighting Preferred:
 Red Lights and Paint Dual - Red & Medium Intensity White
 White - Medium Intensity Dual - Red & High Intensity White
 White - High Intensity Other _____

FAA Aeronautical Study Number 2006-ASO-5950-
 OE _____

16. Site Elevation (AMSL): 793 Feet

17. Total Structure Height (AGL): 315 Feet

18. Overall Height (#16 + #17) (AMSL): 1108

19. Feet

20. Previous FAA and/or Kentucky Aeronautical Study Number(s):

Description of Location: (Attach a USGS 7.5 minute Quadrangle Map or an Airport Layout Drawing with the precise site marked and any certified survey)
 Catlettsburg, KY

21. Description of Proposal:
 We are proposing to construct a 315 ft self support tower.

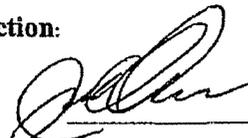
22. Has a "NOTICE OF CONSTRUCTION OR ALTERATION" (FAA Form 7460-1) been filed with the Federal Aviation Administration? No Yes, When 10/09/2006

CERTIFICATION: I hereby certify that all the above statements made by me are true, complete and correct to the best of my knowledge and belief.

Jim O'Dowd  10/10/2006
 Printed Name Signature Date

PENALTIES: Persons failing to comply with Kentucky Revised Statutes (KRS 183.861 through 183.990) and Kentucky Administrative Regulations (602 KAR 050: Series) are liable for fines and/or imprisonment as set forth in KRS 183.990(3). Non-compliance with Federal Aviation Administration Regulations may result in further penalties.

Commission Action: Chairman, KAZC Administrator, KAZC

Approved Disapproved  JOHN HOULIHAN Date 2/14/07